

# **EXHIBIT 7**

**Jennifer E. Aragon**

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**From:** Sam Leonard <[sam@seattledebtdefense.com](mailto:sam@seattledebtdefense.com)>  
**Sent:** Thursday, August 24, 2023 6:36 PM  
**To:** Matthew S. Adams; Jennifer E. Aragon  
**Cc:** Monica L. Schwandt  
**Subject:** RE: Israel and Okorom v. Safeco Insurance Company of America

SUBJECT TO ER 408

Matt,

I have spoken with my clients regarding Safeco's settlement offer. They decline the offer, but see the benefit in getting this settled. To that end, they offer to settle their claims in return for \$100,000.

While my clients appreciate Safeco's offer, they do not believe that it takes into consideration their general damages arising out of Safeco's failure to pay on the claim. I also believe they have a strong bad faith claim given Safeco's failure to document the reasoning for its refusal to cover their claim, and I can foresee no good cause for the denial of the claim.

This offer remains open until September 4.

I am out of town next week, so we can talk more about it, if you like, when I return.

Sincerely,

Sam

*Sam Leonard, Attorney at Law*

Leonard Law, PLLC  
9030 35th Avenue SW ste 100  
Seattle WA 98126  
Ph. (206) 486-1176  
Fx. (206) 458-1176  
[sam@seattledebtdefense.com](mailto:sam@seattledebtdefense.com)  
[www.seattledebtdefense.com](http://www.seattledebtdefense.com)



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**From:** Sam Leonard  
**Sent:** Monday, August 7, 2023 2:21 PM  
**To:** Matthew S. Adams <MAdams@foum.law>; Jennifer E. Aragon <JAragon@foum.law>  
**Cc:** Monica L. Schwandt <MSchwandt@foum.law>  
**Subject:** RE: Israel and Okorom v. Safeco Insurance Company of America

Matt,

My read of the policy is that Safeco is required to pay the total replacement cost of the personal items. Thus, the amount of each item would be the replacement costs as of today. Regarding the specifically scheduled items, everything, but the guitars was stolen. They were able to recover the guitars.

Before we get too far down this road however, I don't see that my clients were ever provided a written statement stating the reasons that the claim was refused. Please provide me with that. Please also provide me with Safeco's position regarding the policy limits.

Sincerely,

Sam

*Sam Leonard, Attorney at Law*

Leonard Law, PLLC  
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Seattle WA 98126  
Ph. (206) 486-1176  
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**From:** Matthew S. Adams <[MAdams@foum.law](mailto:MAdams@foum.law)>  
**Sent:** Wednesday, July 19, 2023 1:25 PM  
**To:** Sam Leonard <[sam@seattledebtdefense.com](mailto:sam@seattledebtdefense.com)>; Jennifer E. Aragon <[JAragon@foum.law](mailto:JAragon@foum.law)>  
**Cc:** Monica L. Schwandt <[MSchwandt@foum.law](mailto:MSchwandt@foum.law)>  
**Subject:** RE: Israel and Okorom v. Safeco Insurance Company of America

ER 408 Settlement Communication

Sam, Thanks for this. Does the insured have a demand? Unfortunately, a lot of these items are very generic, and without pricing, there isn't much we can do. It would also be helpful to know which items are on the list of specifically scheduled items. I think the company would like to see if there is some compromise that can be reached.

Matt

**Matthew S. Adams**

Shareholder

**Forsberg & Umlauf, P.S.**  
901 Fifth Avenue, Suite 1400  
Seattle, WA 98164  
DIRECT 206-346-3945  
OFFICE 206-689-8500  
FAX 206-689-8501  
EMAIL [MAdams@FoUm.law](mailto:MAdams@FoUm.law)



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**From:** Sam Leonard <[sam@seattledebtdefense.com](mailto:sam@seattledebtdefense.com)>  
**Sent:** Wednesday, July 12, 2023 2:51 PM  
**To:** Matthew S. Adams <[MAdams@foum.law](mailto:MAdams@foum.law)>; Jennifer E. Aragon <[JAragon@foum.law](mailto:JAragon@foum.law)>  
**Cc:** Monica L. Schwandt <[MSchwandt@foum.law](mailto:MSchwandt@foum.law)>  
**Subject:** RE: Israel and Okorom v. Safeco Insurance Company of America

Matt and Jennifer,

It was good to meet both of you today. Per our conversation regarding settlement, attached are list of the personal items that were taken from my clients' home by Miggy. The two instruments that were returned in damaged condition are identified. These list are being provided subject to ER-408 and are not to be used as evidence.

Please let me know if you have any questions.

Sam

**Sam Leonard, Attorney at Law**

**Leonard Law, PLLC**  
9030 35th Avenue SW ste 100  
Seattle WA 98126  
Ph. (206) 486-1176

**Fx. (206) 458-1176**

[sam@seattledebtdefense.com](mailto:sam@seattledebtdefense.com)

[www.seattledebtdefense.com](http://www.seattledebtdefense.com)



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From: Matthew S. Adams <[MAdams@foum.law](mailto:MAdams@foum.law)>

Sent: Monday, July 10, 2023 3:19 PM

To: Sam Leonard <[sam@seattledebtdefense.com](mailto:sam@seattledebtdefense.com)>; Monica L. Schwandt <[MSchwandt@foum.law](mailto:MSchwandt@foum.law)>

Cc: Jennifer E. Aragon <[JAragon@foum.law](mailto:JAragon@foum.law)>

Subject: RE: Israel and Okorom v. Safeco Insurance Company of America

Hi Sam, yes. I think that would be very helpful. On Wednesday I am free at 10:00, between 11:30 and 2:00 or after 3:00.

**Matthew S. Adams**

Shareholder

**Forsberg & Umlauf, P.S.**

901 Fifth Avenue, Suite 1400  
Seattle, WA 98164

DIRECT 206-346-3945

OFFICE 206-689-8500

FAX 206-689-8501

EMAIL [MAdams@FoUm.law](mailto:MAdams@FoUm.law)

**FORSBERG  
& UMLAUF, P.S.**  
LITIGATION DEFENSE

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From: Sam Leonard <[sam@seattledebtdefense.com](mailto:sam@seattledebtdefense.com)>

Sent: Monday, July 10, 2023 3:17 PM

To: Monica L. Schwandt <[MSchwandt@foum.law](mailto:MSchwandt@foum.law)>

Cc: Matthew S. Adams <[MAdams@foum.law](mailto:MAdams@foum.law)>; Jennifer E. Aragon <[JAragon@foum.law](mailto:JAragon@foum.law)>

Subject: RE: Israel and Okorom v. Safeco Insurance Company of America

Received.

Mr. Adams and Ms. Aragon,

I would like to set up a call with you to discuss this case and better understand your client's position. Do you have time for a call Wednesday at 10:00 am?

I look forward to working with you.

Sam

**Sam Leonard, Attorney at Law**

**Leonard Law, PLLC**  
9030 35th Avenue SW ste 100  
Seattle WA 98126  
Ph. (206) 486-1176  
Fx. (206) 458-1176  
[sam@seattledebtdefense.com](mailto:sam@seattledebtdefense.com)  
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From: Monica L. Schwandt <[MSchwandt@foum.law](mailto:MSchwandt@foum.law)>  
Sent: Monday, July 10, 2023 2:37 PM  
To: Sam Leonard <[sam@seattledebtdefense.com](mailto:sam@seattledebtdefense.com)>  
Cc: Matthew S. Adams <[MDadams@foum.law](mailto:MDadams@foum.law)>; Jennifer E. Aragon <[JAragon@foum.law](mailto:JAragon@foum.law)>  
Subject: Israel and Okorom v. Safeco Insurance Company of America

Re: *Aidan Israel & Chalse Okorom v. Safeco Insurance Company of America*  
Policy No.: OY8602631  
DOL: June 14, 2022

Counsel,

Please find enclosed the Answers and Affirmative Defenses of Safeco Insurance Company of America that has been filed with the Court. A hard copy will be mailed to you since you have not signed up for ECF e-filing for this case.

Thank you,  
Monica L. Schwandt

**Monica L. Schwandt**  
Legal Assistant

**Forsberg & Umlauf, P.S.**  
901 Fifth Avenue, Suite 1400  
Seattle, WA 98164  
OFFICE 206-689-8500  
FAX 206-689-8501  
EMAIL [MSchwandt@foum.law](mailto:MSchwandt@foum.law)



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